

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re **Crystal P. Clark**

Debtor(s)

Case No. **17-10796**
Chapter **13**

**DEBTOR, CRYSTAL P. CLARK'S, RESPONSE AND OPPOSITION TO
MOTION OF NATIONSTAR MORTGAGE, LLC FOR RELIEVE FROM THE AUTOMATIC STAY**

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6.-7. Denied. It is denied that debtor owed the amount stated by Movant, Nationstar Mortgage of \$1,424.23 for May 2017-July 2017, minus suspense balance of \$75.77. It is believed and therefore averred that there were post-petition mortgage payments made on this account and that the balance stated may not be accurate. Further, it is denied that debtor should be responsible for legal fees and costs.

8. Denied. Debtor is without knowledge as to the exact amount owing to Movant and therefore this averment is denied.

9. Denied. Debtor has made payments into her Chapter 13 plan and the amount of \$565.00 is disputed.

10.-11. Denied. Debtor has acted in good faith in making post-petition mortgage payments, she is employed and wants to keep her house. Debtor may enter a Stipulation for any post-petition payments that may be owing if all parties hereto can reach agreement.

WHEREFORE, Respondent, debtor, respectfully requests that this Honorable Court Deny Nationstar Mortgage, LLC's Motion for Relief.

By: /s/Tova Weiss
Tova Weiss, Esquire
Attorney for Debtor, Crystal P.Clark
Blitshtein & Weiss, P.C.
648 2nd Street Pike
Southampton, PA 18966
Phone: 215-364-4900

Date: August 26, 2017